REMARKS

In response to the Office Action of September 1, 2009, no claims have been amended.

Claim Rejections - 35 USC §102

At section 7, claims 1-7, 16, 17, and 21-23 are rejected under 35 USC §102(e) as anticipated in view of US patent 5,925,481, Singhal, et al (hereinafter Singhal).

With respect to claim 1, the Office asserts that Singhal discloses the recited method with specific reference to column 8, line 57-column 9, line 37, column 10, lines 15-35, column 12, line 1-37, column 13, lines 33-63, column 15, lines 52-65, and column 16, lines 41-62. Applicant notes that the last recited action concerning claim 1 reads in pertinent part "a command for instructing said other device to identify…", whereas the Office presents this last recited action as "a command for instructing a second device to identify…" (Office Action, page 4, emphasis added). Thus, it is respectfully submitted that the Office has not properly represented this portion of the claim.

Applicant has noted that Singhal was cited by the Office in an Office Action mailed on August 9, 2007. In response to that Office Action, Applicant filed a response on November 13, 2007 amending the claims to a form similar to their current form, and provided arguments distinguishing the claims from Singhal. In reply, the Office found the arguments persuasive in overcoming the §102(e) rejection and cited a different reference in the following rejection (see Office Action mailed on January 23, 2008, section 2).

In the November 13, 2007 amendment and response, applicant argued the following at page 8, line 23 through page 10, line 10:

> Singhal discloses a support framework, which enables a wireless interface device (WID) to access and manipulate data stored in a remote network device such as a web server, a file servers, a desktop PC, and the like. A data manipulation server (DMS) provides information about

what services may be performed and how to invoke those services. The DMS may provide data manipulation services either directly or indirectly through one or more protocol proxies.

Fig. 3 of Singhal shows a flow diagram of the method for providing the data manipulation service. Upon a WID user's initiation, the client software on the WID issues a request. The request is routed to a protocol proxy, which forwards the request to an appropriate information source (e.g. a HTTP request for a web content, which is received by a HTTP proxy, is forwarded by the HTTP proxy to a web content server). A response from the information source is received at the forwarding protocol proxy. The protocol proxy then determines which services are available to the WID. It formats the information to include access to the services, and forwards the information to the requesting WID.

The present invention is similar to Singhal in that the user terminal device or the WID transmits a request for information and receives information from a remote entity. However, in the present invention, the retrieved information is applied to configure one or more applications executable at the user terminal device to enable the application accessing the at least one identified data store to obtain data of the at least one content type therefrom, whereas in Singhal, the information is NOT used for configuring one or more applications executable at the WID.

The above-mentioned method of Singhal is used in manipulating data stored in a remote entity. This means the WID is already configured such that the communications between the WID and the DMS or the protocol proxy (communication paths 1, 7, 8 and 12 in Fig.1 of Singhal) are enabled. The WID merely receives information formatted by the DMS or the protocol proxy according to the configuration (step 350 of Fig. 3), and presents the formatted information to the user of the WID. In other words, the configuration of the WID must have been performed, so that it

may properly communicate with the DMS, or the one or more protocol proxies and agents each having specific tasks in the WID support framework of Singhal.

The present invention is exemplified in a flow diagram shown in Fig. 2. Fig. 2 is different from Fig. 3 of Singhal at least in the step S116, which is absent in Fig. 3 of Singhal. In the step S116, the applications of the requesting device capable to access data of the one or more identified data stores are configured in accordance with the information relating to the data store(s) contained in the response (page 19, lines 5-7 of the originally filed specification).

Based on the above, Singhal does not teach "*applying retrieved information to configure one or more applications executable at said user terminal device to enable said applications accessing said at least one identified data store to obtain data of at least one content type therefrom*."

Applicant first notes that the claimed feature relied upon in this earlier response is still present in the claims in nearly an identical form (see e.g., claim 1), with the sole differences between the two claims shown as follows:

applying said retrieved information received by said user terminal device to configure one or more applications executable ~~at said user terminal device~~ thereat to enable said applications accessing said at least one data store to obtain data of at least one content type therefrom (claim 1 as presently pending).

Furthermore, the passages of Singhal cited in the current Office Action (and not cited following the November 13, 2007 Amendment) for disclosing this feature of the claim are column 9, lines 20-37 and column 12, lines 1-23. Both of these passages describe Block 350 of Figure 3 of Singhal, which in the above reproduced response, is clearly cited in distinguishing this feature of the claim from Singhal. Thus, Applicant believes it is reasonable to infer that the Office was aware of Block 350 as described in column 9, lines 20-37 and column 12, lines 1-23, as well as its potential relevance to the

claimed feature, and that because the Office found the arguments provided by Applicant to be persuasive in distinguishing the Applicant's invention from Singhal, the Office also previously considered these passages of Singhal to not anticipate the claimed invention.

Lastly, even if the Office is reapplying Singhal despite its previous belief that it was inapplicable, Applicant respectfully submits that Singhal fails to disclose "applying said retrieved information received by said user terminal device to configure one or more applications executable thereat to enable said applications accessing said at least one data store to obtain data of at least one content type therefrom as set forth in claim 1." It is stated at column 12, lines 4-6 of Singhal, "this annotation comprises modifying the service invocation address to enable the WID's user to easily invoke each available service." Even if one were to interpret this modification of the service invocation address as configuring one or more applications to enable the applications to access the at least one data store, the "service invocation address" of Singhal is clearly distinct from the "retrieved information received by said user terminal." Singhal states "[a] 'service invocation address' is specified for each service…and indicates an address at which the service may be invoked" (Singhal, column 8, lines 57-60). Furthermore, in the current Office Action, the Office clearly equates the service invocation address to the at least one data store descriptor (see Section 4 of the Office Action, where Office states "the invocation address (i.e., descriptor) is used for invoking a service (i.e., identify data store)). It is clear in the claimed invention that the "retrieved information" and the "at least one data descriptor" are distinct. Therefore, it is clear that Singhal does not disclose applying said retrieved information received by said user terminal device to configure one or more applications executable thereat to enable said applications accessing said at least one data store to obtain data of at least one content type therefrom.

The Office has also asserted that the limitation in claim 1 of "said at least one data descriptor identifying at least one content type of data stored in said at least one data store" is anticipated by Singhal, with reference made to column 8, lines 57-61 and column 9, lines 15-19. The Office further asserts in the Response to Arguments found

in section 4 of the current Office Action that the limitation is broadly interpreted to mean that the data store descriptor is used for "indentifying at least one…" Applicant respectfully disagrees.

The Office suggests that because Singhal employs a service invocation address which may take a variety of different formats for invoking a specific data store, it is the equivalent of the claimed limitation, as the invocation address (descriptor) is used for invoking a service (identify data store). While it is true that a service invocation address can take a variety of formats, the format of the address does not specifically relate to a data content type of data in a data store. The Office specifically refers to column 9, lines 15-19 of Singhal, which state "service invocation addresses may employ address formats other than URLs, such as e-mail addresses, or perhaps a combination of an e-mail address and subject line, to designate a service to be invoked." Singhal makes no mention of using a particular format to identify a particular type of content, or to identify a particular service. Rather, it is suggested that Singhal uses different service invocation address formats to identify any service to be invoked. Thus, there is no apparent connection between the service invocation address and at least one content type of data stored in a data store that can be interpreted as disclosing this element of claim 1.

Further, Applicant respectfully disagrees with the Office's interpretation of "at least one data store descriptor identifying at least one content type of data stored." Claim 1 clearly recites that the descriptor identifies a content type of data stored in a data store. Thus, a person having ordinary skill in the art would understand the claim as stating the descriptor itself does the identifying, rather than the Office's assertion that the descriptor "is used for" identifying.

Therefore, for the foregoing reasons, it is respectfully submitted that claim 1 is not anticipated by Singhal and is in allowable form.

For similar reasons as those provided with respect to independent claim 1, it is further respectfully submitted that independent claims 16, 17, and 23 are in allowable form.

Since each of the independent claims of the present application are believed to be allowable, it is respectfully submitted that dependent claims 2-6, 21, and 22 are also allowable at least in view of such dependency.

Claim Rejections - 35 USC §103

At section 18, claim 7 is rejected under 35 USC §103(a) as being unpatentable over Singhal in view of SyncML Protocol (December 2003).

Because claim 1 is believed to be allowable, it is respectfully submitted that dependent claim 7 is also allowable at least in view of such dependency.

It is therefore respectfully submitted that the present application as amended is therefore in condition for allowance and such action is earnestly solicited.

The undersigned respectfully submits that no fee is due for filing this Request for Reconsideration. The Commissioner is hereby authorized to charge to deposit account 23-0442 any fee deficiency required to submit this paper.

Respectfully submitted,

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